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Attorneys for Defendant Western National Bank

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9 UNITED STATES BANKRUPTCY COURT  
10 DISTRICT OF OREGON

11 In re ) Case No 04-34670-tmb7  
12 GKPS, INC , ) Chapter 7  
13 ) SUPPLEMENTAL DECLARATION OF  
Debtor ) PAUL W. LUCAS RE: MOTION FOR  
14 ) SUBSTANTIVE CONSOLIDATION

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17 I, Paul W Lucas, being first duly sworn, declare:

18 1 I am an Executive Vice-President of Western National Bank ("WNB"). I am  
19 competent to testify I make the statements in this declaration based on my personal knowledge

20 2 Attached as Exhibit 3 is a true and correct copy of WNB's payment history on

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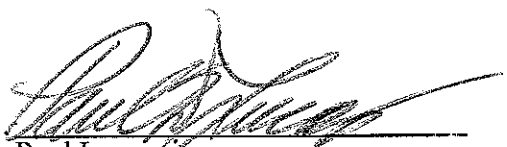
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1 Loan No 222686 to Hospital and Surgical Center Management Services, LP, a Nevada limited  
2 partnership ("HSC").

3 I HEREBY DECLARE THAT THE ABOVE STATEMENT IS TRUE TO THE  
4 BEST OF MY KNOWLEDGE AND BELIEF, AND THAT I UNDERSTAND IT IS  
5 MADE FOR USE AS EVIDENCE IN COURT AND IS SUBJECT TO PENALTY FOR  
6 PERJURY.

7 DATED: August 14, 2006

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11 Paul Lucas

Symphony Healthcare V, LLC, Debtor; Adversary No. 06-03215-tmb

RODOLFO A. CAMACHO, Trustee, and AMY MITCHELL, Trustee, Plaintiffs vs. KENNETH W. PERRY, ROBERTA A. KALE, SUDHIR P. SRIVASTAVA, SURESH N. GADASALLI, and WESTERN NATIONAL BANK, Defendants.

## Western National Bank's Response to Interrogatory No. 1:

## Summary of Transfers on Loan# 222686

	Date	Amount	Transferor	Transfer Account	Details	Additional Comments
1	1-Feb-02	\$1,000,000.00	WNB	Loan 222686	Loan Deposit	Funds deposited into Acct# 22403949
2	17-Mar-02	1,750.00	GKPS Inc.	22403949	Interest Payment	* Transfer made per phone request by K. Perry *
3	18-Apr-02	6,027.78	GKPS Inc.	22403949	Interest Payment	* Transfer made per request by K. Perry *
4	8-May-02	5,833.33	GKPS Inc.	22403949	Interest Payment	
5	3-Jun-02	6,027.77	** DETAILS UNRECOVERABLE**		Interest Payment	
6	1-Jul-02	5,833.34	** DETAILS UNRECOVERABLE**		Interest Payment	
7	1-Aug-02	6,027.77	** DETAILS UNRECOVERABLE**		Interest Payment	
8	3-Sep-02	6,027.78	** DETAILS UNRECOVERABLE**		Interest Payment	
9	1-Oct-02	5,833.33	** DETAILS UNRECOVERABLE**		Interest Payment	
10	3-Nov-02	6,027.78	** DETAILS UNRECOVERABLE**		Interest Payment	
11	2-Dec-02	5,513.89	** DETAILS UNRECOVERABLE**		Interest Payment	
12	2-Jan-03	5,597.22	** DETAILS UNRECOVERABLE**		Interest Payment	
13	31-Mar-03	10,652.78	GKPS Inc.	22403949	Interest Payment	* Interest due through 3/1/03 * Loan Renewed*
14	23-Apr-03	5,597.22	GKPS Inc.	22403949	Interest Payment	* Transfer made per email request by K. Perry *
15	23-Apr-03	100,000.00	Hospital and Surgical Center		Principal Payment	
16	30-Apr-03	50,000.00	GKPS Inc.	22403949	Principal Payment	* Transfer made per email request by K. Perry *
17	30-Apr-03	5,416.67	GKPS Inc.	22403949	Interest Payment	* Transfer made per email request by K. Perry *
18	8-Jul-03	50,000.00	Bulldog IT Corporation	Check #2036	Principal Payment	* Signed by Ken Perry * GKPS, Inc. *
19	8-Jul-03	4,604.17	Bulldog IT Corporation	Check #2036	Interest Payment	* Signed by Ken Perry * GKPS, Inc. *
20	3-Aug-03	50,000.00	Bulldog IT Corporation	Check #2064	Principal Payment	* Signed by Ken Perry * GKPS, Inc. *
21	3-Aug-03	4,604.17	Bulldog IT Corporation	Check #2064	Interest Payment	* Signed by Ken Perry * GKPS, Inc. *
22	3-Sep-03	50,000.00	Bulldog IT Corporation	Check #2085	Principal Payment	* Signed by Ken Perry * GKPS, Inc. *
23	3-Sep-03	4,540.97	Bulldog IT Corporation	Check #2085	Interest Payment	* Signed by Ken Perry * GKPS, Inc. *
24	31-Oct-03	7,998.60	GKPS Inc.	22403949	Interest Payment	* Interest for 9/1/03 and 10/1/03 *
25	20-Nov-03	3,918.05	GKPS Inc.	22403949	Interest Payment	
26	19-Dec-03	3,791.68	GKPS Inc.	22403949	Interest Payment	
27	13-Feb-04	7,836.11	Healthcare Business Credit	22403922	Interest Payment	
28	13-Feb-04	102,163.89	Healthcare Business Credit	22403930	Principal Payment	
29	13-Feb-04	90,000.00	Healthcare Business Credit	22403922	Principal Payment	
30	30-Mar-04	3,046.73	GKPS Inc.	22403655	Interest Payment	* Payment after loan extension *
31	29-Apr-04	2,790.12	GKPS Inc.	22403957	Interest Payment	
32	30-Jun-04	510,883.12	Hospital and Surgical Center	Wire Transfer	Payoff	

EXHIBIT

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PAGE

1 of 1

CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing SUPPLEMENTAL DECLARATION OF  
PAUL W. LUCAS RE: MOTION FOR SUBSTANTIVE CONSOLIDATION on:

Matthew A. Goldberg, Esq.  
Preston Gates & Ellis LLP  
222 SW Columbia St., #1400  
Portland, OR 97201-6632  
Facsimile No. (503) 248-9085  
Of Attorneys for Rodolfo A. Camacho  
Chapter 7 Trustee

J. Stephen Werts, Esq.  
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1001 SW 5<sup>th</sup> Avenue, #200  
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Brad T. Summers, Esq.  
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101 SW Main St., #1100  
Portland, OR 97204  
Facsimile No. (503) 295-1058  
Of Attorneys for Amy Mitchell  
Chapter 7 Trustee

Douglas Pahl, Esq.  
Perkins Coie LLP  
1120 NW Couch Street, 10<sup>th</sup> Floor  
Portland, OR 97209-4128  
Facsimile No. (503) 727-2222  
Of Attorneys for Sudhir P. Srivastava and  
Suresh N. Gadasalli

by **faxing** a full, true and correct copy thereof to the parties at the fax numbers shown  
above, which is the last known fax numbers for the parties' office on the date set forth  
below.

I further certify that, on the date set forth below, true and correct copies of the  
foregoing SUPPLEMENTAL DECLARATION OF PAUL W. LUCAS RE: MOTION  
FOR SUBSTANTIVE CONSOLIDATION was served by electronic notice through the  
bankruptcy court's ECF system, upon the following:

Matthew A. Goldberg, Esq.  
Preston Gates & Ellis LLP  
222 SW Columbia St., #1400  
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[swerts@chbh.com](mailto:swerts@chbh.com)

1 U.S. Trustee  
2 620 SW Main St., Rm 213  
3 Portland, OR 97205  
4 USTPRegion18.PL.ECF@usdoj.gov

5 DATED this 15<sup>th</sup> day of August, 2006.

6  
7 /s/ Sanford R. Landress  
8 Sanford R. Landress, OSB #81438  
9 Attorneys for Defendant Western  
10 National Bank  
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